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March 1, 2024

**VIA ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court  
District of New Jersey  
U.S. Post Office & Courthouse  
2 Federal Square  
Newark, NJ 07102

Re: ***In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS  
MDL No. 3080**

Dear Judge Martinotti:

In accordance with CMO #3, the parties submit the following weekly status report through the undersigned counsel:

1. **Protective Order.** The parties exchanged their respective positions of a joint submission to Judge Singh regarding disputed issues in the proposed Protective Order. The joint submission is to be filed by Wednesday, March 6, 2024.
2. **ESI Order.** Plaintiffs provided Defendants with a list of disputed issues in the proposed ESI Order. The parties are conferring regarding a schedule to promptly bring disputed issues before the Court.
3. **Rule 12 Briefing.** The parties continued their discussions about the procedure for motion-to-dismiss briefing and plan to submit a proposal for the Court at or before the upcoming March 12, 2024 case management conference.
4. **Direct-Filing Order.** Counsel for the Self-Funded Payer Track circulated a draft Direct-Filing Order to Defendants for discussion.
5. **Discovery Plan.** Defendants provided Plaintiffs with a proposed discovery plan.

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We thank the Court for its continued attention to this matter.

Respectfully submitted,

/s/ James E. Cecchi

James E. Cecchi

*Liaison Counsel for*

*Third-Party Payer Class Track*

/s/ Joanne Cicala

Joanne Cicala

*Liaison Counsel for*

*The State Attorney General Track*

/s/ David R. Buchanan

David R. Buchanan

*Liaison Counsel for*

*Self-Funded Payer Track*

/s/ John D. Tortorella

John D. Tortorella

cc: Honorable Rukhsanah L. Singh, U.S.M.J. (via ECF)  
All Counsel of Record (via ECF)